



Munitions Response Site Prioritization Protocol Progress and Challenges at Army Installations and Formerly Used Defense Sites



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OACSIM, Installation Services Directorate
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Topics

- ☐ Overview of Army Inventory
- ☐ MRSPP Overview
- ☐ Army QA Panel
- ☐ QA Panel Results and Feedback
- ☐ Army MRSPP Policy and Guidance
- ☐ Path Forward



Army Environmental Universe

- ❖ 13.8 million acres
- ❖ 155 active installations
- ❖ 10,500 active ranges
- ❖ 950 closed, transferred or transferring ranges
- ❖ 1,400 environmental restoration sites on active installations
- ❖ 270 environmental restoration sites on Base Realignment and Closure (BRAC) installations
- ❖ 2,800 Formerly Used Defense Sites (FUDS) with eligible environmental restoration projects
- ❖ 72 Army National Guard sites





MRSPP Overview

- ❑ The Munitions Response Site Prioritization Protocol (MRSPP) was published as a final rule in the Federal Register on 5 October 2005
- ❑ Assesses defense sites where munitions and explosives of concern (MEC) remains from past DoD operations
 - Unexploded Ordnance (UXO)
 - Discarded Military Munitions (DMM)
 - Munitions Constituents (MC)
- ❑ Used to assign a relative priority to munitions response sites (MRSs) for sequencing of action
- ❑ Includes three evaluation modules, each focusing on a specific hazard:
 - Explosive Hazard Evaluation (EHE) Module
 - Chemical Warfare Materiel Evaluation (CHE) Module
 - Health Hazard Evaluation (HHE) Module



MRSPF Overview

- ❑ Each of the three modules receives a letter priority (A-G) or an “alternative rating”.
- ❑ Alternative ratings:
 - Evaluation Pending
 - No Longer Required
 - No Known or Suspected Hazard
- ❑ An overall MRS priority can be obtained if sufficient information is available to score one or more of the modules
- ❑ The highest single module score determines the overall MRS priority
- ❑ If all three modules receive an alternative rating, the overall MRS priority will be an alternative rating as well



MRSP: Army Responsibilities

- ☐ Apply the Protocol at all MRSs
- ☐ Establish a Quality Assurance (QA) Panel
- ☐ Develop sequencing decisions
- ☐ Document and report the prioritization and sequencing processes and decisions
- ☐ Ensure information provided by stakeholders is included in the MRS Administrative Record, Information Repository, or project file
- ☐ Review each MRS Priority or Alternative MRS Rating at least annually and reapply the Protocol as necessary to reflect new information
- ☐ Ensure stakeholders are offered opportunities as early as possible and throughout the process to participate in the application of the Protocol and sequencing decisions



MRSP Quality Assurance

- ❑ The purpose of quality assurance within the context of MRSP is to:
 - Ensure that the Protocol is applied consistently and correctly across all MRSs in the Army inventory
 - Ensure consistency in data collection methodologies, application of the Protocol, and use and reporting of Protocol data across the military components
 - Ensure that each MRS Priority appropriately reflects documented MRS conditions
 - Serve as an internal management and oversight function
 - Establish and preserve the accountability and credibility of Protocol application



Army QA Panel Function

☐ General Information

- Consists of primary members from Army Secretariat and Army Staff, with participation by Army Environmental Command, Corps of Engineers, National Guard, and Army BRAC Division
- The QA panel does not include individuals involved in applying the Protocol to the MRS under review

☐ Functions

- Reviews scoring packages and supporting documentation to ensure that reasonable logic was used in determining the score
- Ensures that relative priorities accurately reflect MRS conditions
- Ensures that equivalent relative priorities reflect similar MRS conditions throughout the Army inventory

☐ If a revision is recommended that changes an MRS Priority, the QA Panel will:

- Develop a rationale for the change
- Allow stakeholders to comment on the rationale before the change is finalized



MRS Sequencing

- ❑ MRSs are sequenced against others for munitions response actions
- ❑ Based primarily on the MRS's relative priority
- ❑ In general, MRSs with higher relative risks are addressed first
- ❑ The Army may consider other factors ("risk-plus" factors)

Examples of Risk-Plus Factors

- | | |
|---|--|
| <ul style="list-style-type: none">▪ Concerns expressed by regulators or stakeholders▪ Cultural and social factors▪ Economic factors▪ Findings of health, safety, or ecological risk assessments or evaluations based on MRS-specific data▪ A community's reuse requirements at BRAC installations▪ Specialized considerations of tribal trust lands▪ Reasonably anticipated future land use | <ul style="list-style-type: none">▪ Implementation and execution considerations▪ Mission-driven requirements▪ The availability of appropriate technology▪ Implementing standing commitments▪ Established program goals and initiatives▪ Short-term and long-term ecological effects and environmental impacts in general, including injuries to natural resources |
|---|--|

- ❑ Other factors influence sequencing only, not the scores/priorities
- ❑ Stakeholders given opportunity to participate



Early MRSP Implementation

- ❑ DoD developed the MRSP with input from the components, including the Army
- ❑ DoD's manual for the Protocol ("Primer") is less proscriptive by design to allow for differences among DoD components and programs
- ❑ Lack of specific direction from DoD initially resulted in "trial and error" approach to execution
- ❑ USAEC and USACE reacted by developing program-specific implementation guidance



MRSPP QA Panel and User Feedback

- ❑ Need for More Detailed Scoring Instructions for the MRSPP Tables
 - Instructions for completing Table A (site background table) to maintain consistency between programs.
 - Direction on which tables can be omitted when the first table in the EHE and/or CHE is "no known or suspected hazard".
 - Discussion of the type of "evidence" that is required for justifying selections.
 - Direction on how to properly score the cultural and ecological resources tables.
 - General guidance on what is expected to be present in the notes field on each table



MRSPQ QA Panel and User Feedback

- ❑ Special Considerations for the HHE Module
 - Direction needed on which HHE tables are to be completed if no sampling data is available
 - Additional explanation of terms critical to scoring the HHE: "attributable to the MRS", "established background concentration ranges", and "incidental nonmunitions-related contaminants"
 - Clarification on when more current data should be used instead of maximum historical MC concentrations
 - Additional detail on the decision to not to pre-screen contaminants for inclusion in the HHE contaminant hazard factor calculation based on site-specific screening values
 - Process for noting that "sampling was conducted, but no contaminants were found" on the HHE tables, when applicable



MRSPQ QA Panel and User Feedback

- ☐ Use of alternative ratings
 - Some question of the "hierarchy" of alternative ratings
 - Clarification needed on the use of the three alternative ratings in the context of the very specific definitions from the Protocol language
 - Often used term “No Further Action” (NFA) or “No DoD Action Indicated” (NDAI): how to fit into these categories?
- ☐ Information on how to correctly use the Appendix B-1 comparison values
- ☐ How/when to update previously completed MRSPQ scores to bring them up to date with the new Army policy and guidance
- ☐ Direction on addressing overlapping MRSs
- ☐ Upward reporting requirements for Time Critical Removal Actions (TCRAs)



Army MRSP Policy

- ❑ Issued by Army Secretariat on 9 February 2009
- ❑ Provides direction on the following:
 - Flagging or removing sites that were erroneously included in the inventory.
 - Scoring MRS that are in the middle of response actions.
 - How to deal with MRS where potentially responsible party (PRP) issues are involved (specific to FUDS).
 - Whether or not to score the HHE when the EHE and CHE indicate “No Known or Suspected Hazard”
 - How to score a small arms MRS, considering that small arms do not represent “a unique explosive hazard”?
 - The proper use of MRSP comparison values in the HHE for both munitions constituents and “incidental nonmunitions-related constituents”.



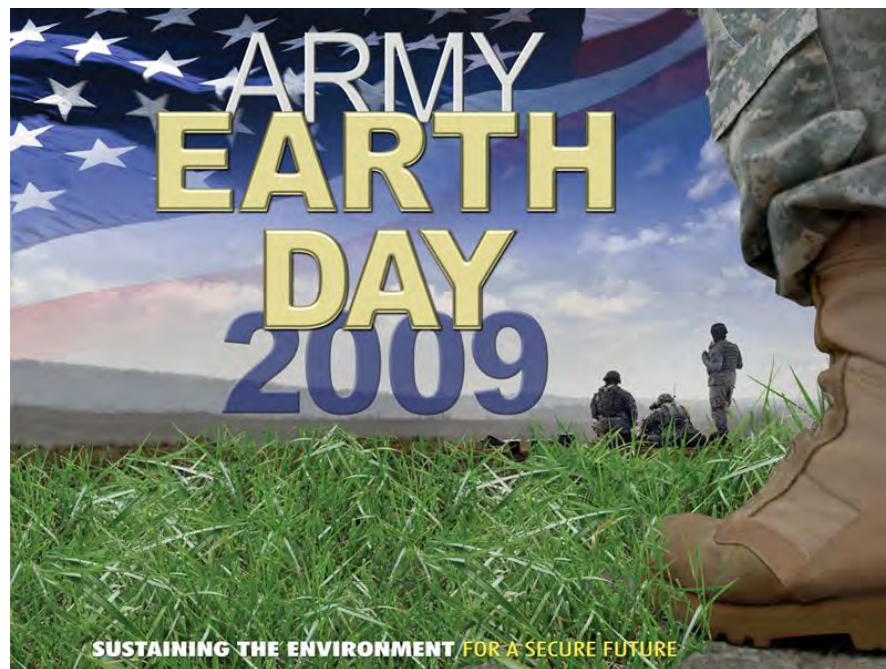
Path Forward

- ❑ Army Staff to develop comprehensive MRSP Program Guidance
- ❑ Army organizations executing the Protocol to perform comprehensive QC check on previously completed MRSs
- ❑ Continued refinement of QA Panel Guidance and the Army's sequencing process
- ❑ Move forward with QA process and submission of Protocol data to Office of Secretary of Defense (OSD)
- ❑ OSD continuing development of an online training tool
- ❑ As required by the Protocol, MRSP scores will be assessed annually



Army Environmental Mission

- ☐ Sustain the environment to enable the Army's mission now and provide for the future.
- ☐ Be an enabler for Army readiness for training, testing, and installation operations supporting the Soldier and Army mission with minimal restriction to operations.





Questions?

